

order to protect personal information of the plaintiff and other Middleton family members.

6. If you contend the discovery period should exceed 90 days, please state reason:
Extensive, complicated and lengthy factual history, going back more than 20 years.
7. It is expected that the parties will reach an agreement on how to conduct electronic discovery. **Yes, the parties will try to reach agreement.** In the event the parties cannot reach such an agreement before the Rule 16 scheduling conference, the Court will enter an order incorporating default standards.
8. Does either side anticipate the use of experts?
Plaintiff **Yes** (yes/no) Defendants **Yes** (yes/no)
If yes, what is the proposed deadline for expert discovery? **60 days from the close of discovery for plaintiff's expert reports; then 30 days for defendant's expert reports; then 60 days for expert depositions.**
9. Does either side expect to file a case-dispositive motion? **Yes** (yes/no)
If yes, under what Rule? **Defendants under Rules 12 and 56; plaintiff under Rule 56.**
If yes, specify the issue: **Statute of limitations; failure to state a claim; malpractice**
Proposed deadline for filing dispositive motions: **60 days from the close of all discovery**
10. Approximate date case should be trial-ready: **June 2020**
Time for Plaintiff's case: **7 days** Time for Defendant's case: **7 days**
11. What is the outcome of your discussions with your clients about proceeding before a Magistrate Judge for final disposition? **Plaintiff requests a jury trial and the case should remain before an Article III judge.**
12. Local Rule 53.3 requires litigants in all civil actions to consider the use of an alternative dispute resolution process. Is mediation or a settlement conference likely to be helpful?
Yes (yes/no)
If so, when: Early **No** (yes/no) After Discovery **Yes** (yes/no)

/s/ Joel M. Young

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